

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:)
Peter M. Kranack,) Bankruptcy No.: 15-23309-JAD
Debtor)
)
) Motion No.:
Ronda J. Winneccour, Chapter 13 Trustee,)
Movant) Document No.: 82
vs.)
)
)
U.S. Bank Trust National Association,)
As trustee for CVP III Mortgage Loan Trust II)
Respondent)

DEBTOR'S RESPONSE TO TRUSTEE'S MOTION FOR DETERMINATION
MORTGAGE CREDITOR HAS BEEN PAID PER PLAN AND TO CONFIRM
DEBTOR RESUMPTION OF PAYMENTS

1. Admitted. Answering further, the proof of claim filed by Carrington included as an attachment the original mortgage from PNC dated 06/04/2004 in the amount of \$27,306.00.
2. Admitted. Answering further, the proof of claim filed by Cerastes included as an attachment a Loan Modification Agreement from Selene Finance dated 01/09/2013 in the amount of \$31,708.22.
3. Admitted.
- 3.2 Admitted.
4. Denied that there were no Notices of Postpetition Mortgage Fees, Expenses, and Charges (hereinafter “PPFN”). To the contrary a PPFN was filed on 02/05/2018, and another on 03/21/2018:
 - a. The PPFN filed on 02/05/2018 concerned a “school tax advance” incurred on 8/30/2017 in the amount of \$1,774.09.

- b. The PPFN filed on 03/21/2018 concerned an “insurance advance (non-escrow)” incurred on 01/09/2018 in the amount of \$610.00.
- c. The Chapter 13 Trustee’s records indicate both items have been paid.

5. Admitted. Further answering, the Loan Modification Agreement from Selene Finance dated 01/09/2013 provides for a Maturity Date of December 1, 2019.

6. Admitted.

7. Admitted.

WHEREFORE, the Debtor respectfully requests that the Court enter the Order proposed by the Trustee, and for such other relief the Court deems equitable and just.

Date: 12/4/2020

s/ Robert S. Shreve
Robert S. Shreve, Esquire
Akman & Associates, LLC
345 Southpointe Blvd., Suite 100
Canonsburg, PA 15317
724-514-1001
PA Bar ID No.: 42918
rsshreve@akmanlegal.com